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Attorneys for Defendants
Transamerica Life Insurance Company,
Transamerica Investment Management, LLC
and Transamerica Asset Management, Inc.

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

JACLYN SANTOMENNO, KAREN
POLEY, and BARBARA POLEY, et
al.,

Plaintiffs,

v.

TRANSAMERICA LIFE
INSURANCE COMPANY,
TRANSAMERICA INVESTMENT
MANAGEMENT, LLC, and
TRANSAMERICA ASSET
MANAGEMENT, INC.,

Defendants.

Civil Action No. 11-736 (ES) (PS)

**TRANSAMERICA LIFE
INSURANCE COMPANY'S
NOTICE OF MOTION TO
DISMISS CLASS ACTION
COMPLAINT**

TO: Robert L. Lakind
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Attorneys for Plaintiffs

COUNSEL:

PLEASE TAKE NOTICE that on Monday, September 19, 2011, at 9:30 a.m. or as soon thereafter as counsel may be heard, Defendant Transamerica Life Insurance Company ("TLIC"), located at 1150 South Olive Street, Los Angeles, California 90015, by and through its undersigned counsel, will move before the Honorable Esther Salas, U.S.D.J., for entry of an order pursuant to Fed. R. Civ. P. 12(b)(6) dismissing the Class Action Complaint in this case with prejudice.

PLEASE TAKE FURTHER NOTICE that in support of this motion, TLIC will rely upon the Memorandum and supporting Declaration of Darcy Hatton submitted herewith. A proposed form of Order is also submitted. TLIC requests oral argument of this motion.

Dated: July 29, 2011

s/ Thomas R. Curtin

Thomas R. Curtin

George C. Jones

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